

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

THOMAS D. SELGAS (1)
MICHELLE L. SELGAS (2)
JOHN GREEN (3)

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Case 3:18-cr-00356-S

JOHN GREEN'S MOTION FOR CONTINUANCE

Now comes Defendant John Green ("Defendant" or "Green"), and respectfully shows the Court the following:

1. On September 14, 2018, this Court granted Defendant, Michelle L. Selgas' Motion for Continuance and has reset the trial to April 29, 2019. (Please see the executed order attached hereto as Exhibit A and incorporated by reference herein.)

2. Counsel for Defendant, John Green, since this setting, has been set for jury trial in the Eastern District of Michigan, Northern Division; United States of America v. James D. Pieron, Jr.; Case No. 1:18-cr-20489. Jury trial is to begin in Bay City, Michigan on February 26, 2019, a trial that is likely to extend into April, 2019. Trials in Bay City, Michigan are half day proceedings. Counsel was retained for the Michigan case prior to Green's indictment.

3. Since the original continuance, your Defendant, John Green won an election to the House of Representatives in Idaho. His elective duties make it exceedingly difficult to prepare for an April trial. The legislative session could extend as late as May of 2019, should the House of Representatives in Idaho find a need to hold "Special Sessions", which is a common occurrence.

4. The coupling of Green's election and the prior need for another party's continuance has created these time conflicts.

5. In another unrelated case, United States of America v. Jack Stephen Pursley; Case No. 4:18-cr-00575; Southern District of Texas (Houston division), the District Court ordered a deposition to take place in the Isle of Man in the next 90 days, a rare ruling in any federal criminal case. The deposition will take a substantial amount of time. Defendant Green's small defense firm cannot competently handle these obligations and still announce ready on the current assignment date.

6. The Government does not object to the continuance. The Government has a conflict in the month of May 2019, and has, as a courtesy, asked counsel not to request a May 2019 setting.

7. Counsel for Defendant, Thomas Selgas, has a conflict in the month of June 2019. He will have a two (2) week trial in the beginning of June and his daughter's out-of-state wedding in the second half of June.

8. Accordingly, counsel for Defendant, John Green, for good cause shown, respectfully requests that this Court grant a continuance of the trial setting in this case until July 2019 or any date thereafter that is convenient to this honorable Court.

MINNS & ARNETT

/s/ Ashley Blair Arnett

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Attorneys for John Green

CERTIFICATE OF SERVICE

This is to certify that on this the 14th day of January 2019, a true and correct copy of the above and foregoing instrument was served upon all counsel of record.

/s/ Ashley Blair Arnett

Ashley Blair Arnett